5. OTHER CEQA CONSIDERATIONS

Cumulative Impacts

CEQA requires the analysis of impacts due to cumulative development that would occur independent of, but during the same timeframe as, the project under consideration, or in the foreseeable future. In this context, cumulative impacts are those that if added to the impacts of the Draft General Plan would increase the severity, or the significance of impacts of the Draft General Plan. By requiring an evaluation of cumulative impacts, CEQA attempts to minimize the potential that large-scale environmental impacts would be ignored due to the project-by-project nature of project-level analyses contained in EIRs.

Cumulative analyses need not be undertaken in the same manner as those aimed at evaluating the project under consideration. According to Section 15130(b) of the CEQA Guidelines,

> The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness. The following elements are necessary to an adequate discussion of cumulative impacts:
>
> (1) Either:
>
> (A) A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency, or
>
> (B) A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or areawide conditions. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency...
>
> (2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
>
> (3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of the proposed projects.

The CEQA Guidelines go on to recognize that by their nature cumulative impacts, and their respective mitigation measures, are not necessarily under the control of the lead agency, and may not necessarily be project specific in nature. Section 15130 of the CEQA Guidelines states:

> With some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.

As discussed in Chapter 4, the context for determining cumulative impacts is countywide development through the year 2020. The Proposed Project by itself (i.e., the growth attributable directly to the Economic Development Strategy and the Draft General Plan policies) represents a relatively small portion of the growth projected to occur in the county by 2020, because the population growth would be unchanged by the project. The difference between the project and not approving the project is the growth that would occur in the employment sector and the mix of employment and the patterns of development that would occur in the unincorporated area.

Each of the impacts identified in Chapter 4 considers the effects of growth related directly to the project along with the growth that is projected to occur in the County with or without project. Consequently, most of the impacts identified in Chapter 4 address both cumulative (at least partially) and project-specific impacts. In some cases, such as the loss of biological resources and the increase in air pollutants, the cumulative context extends beyond the boundaries of the county, because the particular resource that is affected covers a larger region than the county.

The following is a summary of the significant cumulative impacts that have been identified for the Proposed Project.

Land Use

No cumulative impacts were identified for Land Use.

Agriculture

- Permanent loss of important farmland, reduction in agricultural production, and an increase in the non-renewal and cancellation of Williamson Act Contracts.

Transportation

- Increases in passenger vehicle and truck traffic volumes and congestion on rural and local roadways and State highways.

Wastewater, Storm Drainage and Flooding

- Increases in stormwater runoff that could increase flooding potential.

- Increases in wastewater flows and stormwater runoff containing pollutants that could affect receiving water quality.

Public Services

- Increased demand for police protection services and facilities.

- Increased demand for fire protection and emergency services.
- Increased demand for parks and recreation facilities.
- Increased demand for libraries.

Cultural Resources

- Loss of or damage to subsurface prehistoric resources.
- Devaluation, disturbance, alteration or destruction of historic areas, sites, and structures.

Water Resources

- Increased demand for water supply and water treatment and delivery systems.
- Changes in aquifer characteristics.
- Increases in stormwater runoff containing constituents that could adversely affect receiving quality.

Biological Resources

- Loss of wetland habitat.
- Loss of habitat for special-status wildlife species.
- Loss of habitat for special-status plants.
- Loss of heritage or landmark trees.
- Loss of riparian and aquatic habitat.
- Loss of grassland habitat.

Forestry Resources

- Conversion of forest lands to non-forest uses.
- Creation of land use incompatibilities between timber operations and other land uses.

Mineral Resources

- Potential loss of land available for mineral resource extraction.

Air Quality

- Increase in air pollutant emissions, including PM_{10}, CO, ROG, and NO_X, caused by mobile source activity, area sources, and stationary sources.

Seismic and Geologic Hazards

No cumulative impacts were identified for Seismic and Geologic Hazards.

Hazardous Materials

- Increase in hazardous waste generation.

Noise

- Increases in mobile and fixed noise source levels, resulting in permanent increases in ambient noise levels that could affect sensitive receptors.

Visual Quality

- Substantial alteration to the existing visual character of the region and/or visual access to scenic resources (including introduction of new sources of light and glare to rural areas).

Growth Inducing Effects

Introduction

An EIR must discuss the ways in which a proposed project could foster economic or population growth or the construction of additional housing in the vicinity of the project and how that growth would, in turn, affect the surrounding environment (see CEQA Guidelines Section 15126.2[d]). Growth can be induced in a number of ways, including through the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

Two issues must be considered when assessing the growth-inducing effects of a project:

- **Elimination of Obstacles to Growth:** The extent to which additional infrastructure capacity or a change in regulatory structure would allow additional development in the county and region; and

- **Promotion of Economic Expansion:** The extent to which the Proposed Project could cause increased activity in the local or regional economy. Economic effects can include both direct effects, such as the direction provided by the Economic Development Strategy, which is intended to stimulate certain kinds of economic activity, and indirect or secondary effects, such as increased commercial activity needed to serve a new population.

Elimination of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service

infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

The Proposed Project does not include specific plans for new infrastructure, and it would not remove any regulatory or physical obstacles to growth. However, the Draft General Plan policies provide for the expansion of infrastructure to accommodate new growth in the unincorporated areas. The cities would also need to expand their infrastructure to serve new development. To the extent that new infrastructure is sized to serve only existing and planned development (including growth related to the Proposed Project), growth inducement would not occur. However, if infrastructure is oversized it could induce growth by making capacity readily available to new development.

Economic Effects

Direct Effects on Growth

As discussed in Chapter 2, Project Description and Demographic Information, the county's population is anticipated to increase from approximately 770,000 (1996) to approximately 1,115,000 by 2020. This population growth is based on California Department of Finance projections, and would occur whether or not the Proposed Project is adopted. Therefore, the Proposed Project would not have a direct effect on population growth in the county. However, the Proposed Project would direct the manner in which the anticipated increase in population occurs, to the extent that it is within the County's jurisdiction, through the Draft General Plan policies. In addition, the Proposed Project is intended to direct growth toward the urban areas, with only seven percent of new development occurring in the outside of cities and their spheres of influence. If successful, the Proposed Project would increase population growth in some cities (compared to growth without the project), but would not affect total population growth in the county.

While the Proposed Project would not alter the amount of population growth, it would induce growth in non-residential sectors. The Economic Development Strategy, which is part of the project, is designed to achieve a substantial reduction in the County's unemployment rate through changes in the economy by altering the mix and amount of employment-generating development in the cities and unincorporated areas of the county. As shown in Table 2-10 in Chapter 2, there would be substantial increases in office and industrial uses associated with the Proposed Project (compared to conditions without the project). This increase in employment would be a direct effect of the Proposed Project. The environmental effects of the projected increase in county population and increased economic activity are addressed in Chapter 4 of this Draft EIR.

Indirect Effects on Growth

Increased industrial, commercial and residential development typically generates a secondary or indirect demand for other services. For example, Fresno's growing population will require additional goods and services, such as groceries, entertainment and medical services, which will stimulate economic activity in these sectors. The expansion of these activities will require more land and create environmental impacts. The growth projections provided in Chapter 2 include this secondary economic activity, so the effects of such growth are evaluated in Chapter 4 of this Draft EIR.

Because the Proposed Project would not alter the population projections, the secondary effects of increased residential demand for goods and services is independent of the project. The Proposed Project would result in greater employment-generating uses, which could generate a secondary demand for goods and services to support new and expanding business. In this way, the Proposed Project could be growth-inducing.

Summary

In summary, the Proposed Project would not induce additional population growth in the county, but would increase the amount of economic activity due to changes in the employment-generating uses. Therefore, the Proposed Project would be growth-inducing. The environmental effects of growth due to the Proposed Project are evaluated in Chapter 4.

Significant Irreversible Environmental Effects

Under CEQA, an EIR must analyze the extent to which a plan's primary and secondary effects would commit resources to uses that future generations will probably be unable to reverse [CEQA Guidelines Section 15126(f)].

Implementation of the Proposed Project would result in the irreversible commitment of certain natural resources. The most notable significant irreversible impacts are commitment of energy resources in the form of natural gas and electricity, increased generation of pollutants, and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources such as lumber and other forest products, mineral resources, and water resources for residential and nonresidential development throughout the county.

Development under the Proposed Project would use substantial natural resources both during and after construction. During construction, fossil fuels and building materials (e.g., wood and aggregate) would be consumed. As construction of specific projects is completed, fossil fuels would be consumed by employee and resident vehicle use, heating and cooling of buildings, and generation of electricity. The use of these resources is unavoidable consequences of development. The magnitude of this use would be partially offset by required compliance with Title 24 and other energy conservation measures and the implementation of the Transportation Systems Management Plan intended to reduce the use of single-occupancy vehicles. Please see Chapter 4 for a more complete discussion of the effects of the Proposed Project on specific natural resources.

Significant And Unavoidable Impacts

According to CEQA Guidelines [Section 15126, subd. (b); Section 21000, subd. (b).], a Draft EIR must include a description of those impacts identified as significant and unavoidable should the proposed action be implemented. These impacts are unavoidable because it has been determined that either no mitigation, or only partial mitigation, is feasible. This Section identifies significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigations imposed by the County. The final determination of significance of impacts and of the feasibility of mitigation measures would be made by the County as part of certification action.

The potential environmental impacts that would result from implementation of the Proposed Project are summarized in Table 2-1. In some cases, impacts of development in the unincorporated area would be less than significant with implementation of Draft General Plan polices and after the mitigation measures described in Table 2-1. Impacts of the Proposed Project that would be due to development occurring in other jurisdictions are considered significant and unavoidable, because the County cannot compel other jurisdictions to adopt policies or mitigation that would reduce environmental impacts. Significant and unavoidable impacts of the Proposed Project, for areas within and outside of the County's jurisdiction, are discussed in detail in Chapter 4, and are listed below. Significant unavoidable cumulative impacts caused by the Proposed Project, along with growth that is projected to occur in the County with or without the project, is provided under Cumulative Impacts, above.

Significant and Unavoidable Impacts for Development within County Jurisdiction

Agriculture

- Permanent loss of important farmland.
- Reduction in agricultural production.
- Increased non-renewal and cancellation of Williamson Act Contracts.

Transportation and Circulation

- Increased traffic volumes on rural roadways, State highways, and urban roadways.
- Increased demand for transit services.
- Increased demand for bicycle facilities.

Wastewater, Storm Drainage and Flooding

- Increased demand for wastewater treatment facilities.
- Increased need for storm drainage facilities.

Public Services

- Increased demand for police and fire protection services, park and recreation facilities, and library services.

Water Resources

- Increased demand for water, potentially leading to groundwater overdraft and loss of groundwater recharge potential.
- Increased need for water treatment and delivery systems.
- Exacerbation of groundwater overdraft conditions, resulting in subsidence, lowering of water tables or alterations to the rate and direction of contaminated groundwater flows.

Biological Resources

- Loss of wetland habitat.
- Loss of habitat for special-status wildlife species.
- Loss of habitat for special-status plants.
- Degradation of riparian and aquatic habitat.
- Loss of grassland habitat.

Air Quality

- Increased emissions caused by mobile source activities, area sources, and stationary sources.

Significant and Unavoidable Impacts for Development Outside County Jurisdiction

The above impacts would be considered significant and unavoidable for development in the incorporated areas. In addition, the following impacts would be considered significant and unavoidable.

Land Use

- Increased potential for residential-agricultural and urban residential-rural residential conflicts.

Agriculture

- Permanent loss of important farmland.
- Reduction in agricultural production.
- Increased non-renewal and cancellation of Williamson Act Contracts.

Transportation and Circulation

- Increased traffic volumes on urban roadways and State highways.
- Increased demand for transit services.
- Increased demand for bicycle facilities.

Wastewater, Storm Drainage and Flooding

- Increased demand for wastewater treatment facilities.
- Increased need for storm drainage facilities.
- Potential exposure of new development to flood hazards.
- Potential exposure of new development to dam failure inundation hazards.

Public Services

- Increased demand for police protection, fire protection and emergency services, parks and recreational facilities and library services.

Cultural Resources

- Disturbance, alteration or destruction of subsurface archaeological prehistoric resources.
- Devaluation, disturbance or destruction of historic areas, sites, and structures.

Water Resources

- Increased demand for water, potentially leading to groundwater overdraft and loss of groundwater recharge potential.
- Increased need for water treatment and delivery systems.
- Exacerbation of groundwater overdraft conditions, resulting in subsidence, lowering of water tables or alterations to the rate and direction of contaminated groundwater flows.
- Increased runoff containing urban contaminants leading to degradation of receiving water quality.
- Degradation of water quality related to individual septic system use.

Biological Resources

- Loss of wetland habitat.
- Loss of habitat for special-status wildlife species.
- Loss of habitat for special-status plants.
- Degradation of riparian and aquatic habitat.
- Loss of grassland habitat.
- Loss of heritage or landmark oak trees.

Mineral Resources

- Reduction in the amount of land available for mineral extraction.
- Land use incompatibilities between mineral extraction operations and adjacent uses.

Air Quality

- Increased air pollutant emissions due to construction activities.
- Increased air pollutant emissions caused by mobile source activities, area sources, and stationary sources.
- Potential violations of localized (intersection) carbon monoxide standards.

Seismic and Geologic Hazards

- Increased exposure of people to hazards associated with unreinforced masonry buildings.
- Increased number of people in areas subject to landslide hazards.
- Increased erosion.

Hazardous Materials

- Increased risk of exposure to existing soil and groundwater contamination.

Noise

- Exposure of sensitive receptors to unacceptable traffic and stationary source noise levels.

Visual Resources

- Substantial alterations to the existing visual character of the region and/or visual access to scenic resources.
- Introduction of new sources of light and glare into rural areas.